

1 Law Office of Adam Pennella
2 Adam Pennella, State Bar No. 246260
3 717 Washington Street
4 Oakland, CA 94607
5 Phone (510) 444-4419
6 Fax (510) 417-4149

7
8 Counsel for Defendant
9 CELLIE STURNS

10 UNITED STATES DISTRICT COURT
11
12 NOTHERN DISTRICT OF CALIFORNIA
13
14 SAN FRANCISCO DIVISION

15 UNITED STATES OF AMERICA,
16
17 Plaintiff,

18 vs.

19 CELLIE STURNS,
20 Defendant

Case No.: CR 12-060 MMC

21 STIPULATION AND ~~[PROPOSED]~~
22 ORDER ALLOWING DEFENDANT
23 TO TRAVEL

24
25 GOOD CAUSE APPEARING, IT IS HEREBY STIPULATED by the parties through
26 their counsel that defendant CELLIE STURNS may travel outside the Northern District of
27 California to and within the Eastern District of California on June 30, 2012 and July 7, 2012.
28 On June 30, 2012, Ms. Sturns and her family plan to visit her niece, who lives in Sacramento,
CA. On July 7, 2012, Ms. Sturns and her elderly mother plan to visit Cache Creek Casino,
located in Sacramento, CA.

United States Pretrial Services Officer Josh Libby has advised Ms. Sturns' counsel that he
does not object to the travel proposed by this stipulation.

1 It is further ORDERED that Ms. Sturns shall communicate with Pretrial Services before,
2 during (if directed by Pretrial Services) and immediately after the proposed travel. Ms. Sturns is
3 further ordered to provide Pretrial Services with a way to contact her during this travel.

4 All other terms of Ms. Sturns' pretrial release shall remain in effect.

5
6 SO STIPULATED:

7
8 Dated: June 12, 2012

_____/s/_____
Adam Pennella
Counsel for Cellie Sturns

9
10
11 Dated: June 12, 2012

MELINDA HAAG
UNITED STATES ATTORNEY

12
13
14 _____/s/_____
Kevin Barry
Assistant United States Attorney

15
16
17 SO ORDERED:

18
19 Dated: 6/14/12

20 _____
Honorable Maria Elena James
United States Magistrate Judge